

Executive Registry  
76-93181

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

U. S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
**FILED**

JUN 1 1976

Frances Hilliard Brown  
3248 Chapel Creek # 108  
Dallas, Texas 75220

Plaintiff BY JOSEPH McELROY, JR., CLERK

Deputy

CA 3-76-07547

vs

American Telephone & Telegraph  
Company (Nation-Wide System)  
New York City, N. Y.  
c/o District Manager, W.E. White  
4100 Bryan  
Dallas, Texas

Defendant

Cause of Action: Obstruction of Justice, Deprivation  
of Plaintiff's Constitutional and  
Civil Rights, and Illegal Monitoring

I

JURISDICTION

Plaintiff brings this action under Title 42, Section 1985 and 1986 U.S.C. against the American Telephone & Telegraph Company's (Wat Lines) for conspiring to obstruct justice and in collusion with it's subscribers to deprive plaintiff of fundamental rights and freedoms guaranteed by the laws and Constitution of the United States. Jurisdiction is conferred on the Court by Title 28, Section 1343 U.S.C.

In addition to the afore-mentioned civil action, plaintiff alleges that a criminal act has been committed in violation of Title 18, Section 2510, 2511 and subsequent sections dealing with illegal monitoring and unlawful uses of a communication system.

II EXHIBIT PRELIMINARY DECLARATION FILED 04/2

STATEMENT OF CLAIMS

(a) The Obstruction of Justice complaint arises from the difficulty the plaintiff encountered in endeavoring to uncover facts which would have established the jurisdiction of the

OGC Has Reviewed

Federal Court in an action against Baylor-Dallas, Baylor-Houston, Scott & White Clinic (CA 3-74-115-E). And in similar actions against Dr. J. Hobson Crook (CA 4-75-204) and Dr. J. E. Myers (CA 4-75-205). This failure led to a dismissal of the actions due to lack of jurisdiction, when had her efforts been successful and the case tried on its merits, a different outcome might have ensued. In the aforementioned actions the plaintiff had alleged her constitutional and civil rights had been violated by the implanting of electronic devices.

Plaintiff maintains that because of electronic monitoring of her thoughts and actions through the use of WAT lines and through the use of computers utilizing A.T. & T. lines that every effort to secure information which would sustain the allegations met with failure

(b) Further, plaintiff alleges that A.T. & T. shares a joint culpability with its subscribers in the original charges in as much as she has never at any-time given her permission to such implantation or subsequent monitoring.

(c) Finally, the plaintiff alleges that A.T. & T. has been guilty of a gross and unprecedented violation of the Federal Statutes Title 18, Sections 2510 and 2511. And that having been guilty of said violations did permit their lines to be used by all those who would harass the plaintiff in an effort to establish probable cause.

### III

#### LIMITATIONS

This action is filed in the District Court within two years of the time the original case was dismissed, May 31, 1974. This to comply with the Federal Statute of Limitations for Damages and Personal Injury, as well as the Texas Statute as specified by Texas Civil Statutes, Title 91, Article 5526 (6).

The plaintiff has realized for some time that private WAT lines were involved in her problems, but she did not know the specifics by which they operated. Neither did she know the circuit in her brain was one maintained by A.T. & T. Arrangements for a deposition by means of written interrogatories had been filed seeking information from the Company but due to the dismissal of the Case, were never asked.

#### IV

#### OTHER PARTIES TO THE LITIGATION

As indicated in the accompanying Motion, the plaintiff has on file in the District Court "Obstruction of Justice" charges against I.T. & T. (World Comm) as well as charges against Mr. James H. Holmes, III, Mr. C. A. Searcy Miller, Mr. Ralph Hartman, Mr. Richard Gray, Attorneys for the original defendants.

Also on file with the Court are complaints against the Department of Health, Education & Welfare, the Department of Defense and the Central Intelligence Agency for "obstruction of justice" and "illegal monitoring". Accompanying the complaints against the Federal Agencies is a request the "obstruction of justice" charges be combined with prior pending cases to save time and piecemeal litigation. A similar Motion is being submitted to the Court with this Complaint.

#### V

#### RELIEF REQUESTED

Plaintiff is seeking an injunction against any further monitoring, electronic harassment of whatever nature, backed by law enforcement. She is also seeking some \$48,000 reimbursement for monies spent in trying to obtain relief, salary retroactive to 1969 and until age 65 (1980) and whatever relief is possible medically without changing the plaintiff's brain pattern. In addition she has asked the Court to assess whatever punitive damages are equitable.

VI

CONCLUSION

Wherefore, the plaintiff prays that a speedy and just resolution may be had to the controversy and that she may be granted the relief to which she is entitled. And that any parties or attorneys connected in anyway with this and previous actions be enjoined from collecting any fees or expenses of what-so-ever nature and be restrained from any action against the plaintiff.

Respectfully submitted,

Dated June 1 1976

Signed Frances Hilliard Brown  
Frances Hilliard Brown

CERTIFICATE OF SERVICE

This will certify that copies of the attached Motion and accompanying Complaint against A.T. & T. have this day been sent by certified mail to the following:

Dr. F. David Matthews, Sec'y  
Dept of Health, Education &  
Welfare

330 Independence Ave., S.W.  
Washington, D. C. 20501

Mr. Donald Rumsfeld, Sec'y  
The Department of Defense

The Pentagon  
Washington, D. C. 20301

Mr. George Bush, Sec'y  
The Central Intelligence Agency

Washington, D. C. 20505

Mr. Logan Ford, representing Mr. James Holmes, - Baylor-Dallas  
1511 Fidelity Union Life Building  
Dallas, Texas 75201

Mr. L. W. Anderson representing Mr. Searcy Miller, Baylor-Houston  
3100 Fidelity Union Tower  
Dallas, Texas 75201

Mr. David S. Kidder, representing Mr. Richard Gray -Dr. J. E. Myer  
3200 Republic National Bank Building "J. Hobson Croo  
Dallas, Texas 76201

Mr. John Skrhak representing Mr. Ralph Hartman, Scott & White  
4300 First National Bank Building Clinic  
Dallas, Texas 75202

Mr. R. Glen Ayers, Jr. Attorney for I.T. & T. (World-Comm)  
3600 First National Bank Building  
Dallas, Texas 75202

Dated June 1 1976

Signed

Frances Hilliard Brown  
Frances Hilliard Brown

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